

# EXHIBIT D

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

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Case No. 3:23-cv-03417-VC

**PLAINTIFFS' FIFTH SET OF REQUESTS  
FOR PRODUCTION TO DEFENDANT  
META**

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 79**

All Documents and Communications related to the decision to describe the Books3 database as “publicly available” in the Llama 1 Paper.

**REQUEST FOR PRODUCTION NO. 80**

All Documents and Communications related to the decision to describe the Books3 database as “publicly available” in the Llama 2 Paper.

**REQUEST FOR PRODUCTION NO. 81**

All Documents and Communications related to the decision to use Shadow Datasets for training Llama Models.

**REQUEST FOR PRODUCTION NO. 82**

All Documents and Communications related to the role of EleutherAI in the acquisition and use of Books3.

**REQUEST FOR PRODUCTION NO. 83**

All Documents and Communications related to the role of The Eye in the distribution of Books3.

**REQUEST FOR PRODUCTION NO. 84**

All Documents and Communications related to the role of Hugging Face in the distribution of Books3.

**REQUEST FOR PRODUCTION NO. 85**

All Documents and Communications related to the decision to use Torrent Systems to acquire data for training Llama Models.

**REQUEST FOR PRODUCTION NO. 86**

All Documents and Communications related to the decision to use books for long-range context modeling research.

**REQUEST FOR PRODUCTION NO. 87**

All Documents and Communications related to the decision to use books for coherent storytelling in the training of Llama Models.

**REQUEST FOR PRODUCTION NO. 129**

Documents sufficient to identify all individuals, currently or formerly employed by Meta, including their roles and titles, who work or worked on Meta's AI research and development projects, including Llama models, and/or on Meta's licensing efforts with respect to AI training data.

**REQUEST FOR PRODUCTION NO. 130**

All Documents and Communications, including discussions, deliberations, or negotiations related to any actual, proposed, or contemplated licensing agreements (even if never written or executed) for AI training data, including any actual, proposed, or contemplated terms, conditions, and consideration.

Dated: October 9, 2024

By: /s/ David L. Simons

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**CERTIFICATE OF SERVICE**

I, the undersigned, am employed by the Boies Schiller Flexner LLP. My business address is 55 Hudson Yards, New York, NY 10001. I am over the age of eighteen and not a party to this action.

On October 9, 2024, I caused the following documents to be served by email upon the parties listed on the attached Service List:

- **PLAINTIFFS' FIFTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META**

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 9, 2024.

*/s/ David L. Simons*

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